

ERIC A. LIEPINS
ERIC A. LIEPINS, P.C.
12770 Coit Road, Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - Telefax

Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE	§	
	§	
FINANCIAL STRATEGIES	§	
ACQUISITION CORP	§	Case no.23-32655 -11
	§	
	§	
	§	CHAPTER 11
DEBTOR	§	

DEBTOR'S MOTION TO VACATE DISMISSAL AND REINSTATE PROCEEDING

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 1100 COMMERCE STREET, 12TH FLOOR DALLAS, TEXAS 75242, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.

IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE HARLIN HALE:

COMES NOW, Financial Strategies Acquisition Corp, Debtor in the above styled and numbered cause, and files this its Motion to Vacate Dismissal and Reinstate Case and in support

thereof would respectfully show unto the Court as follows:

1. The Debtor filed its Chapter 11 proceeding on November 13 , 2023.
2. At the time of the filing Debtor did not file its schedules and statement of financial affairs.
3. At the time of the filing Debtor did not have experienced bankruptcy counsel and counsel failed to file schedules and other related documents.
4. On November28, 2023 Debtor contacted and met with the undersigned counsel and retained the undersigned counsel to represent the Debtor.
5. After the meeting, the undersigned counsel prepared for filing a Motion to Extend the Time for Filing Schedules and Statement of Financial Affairs.
6. The undersigned counsel went to file the Motion to Extend and noticed that case had been dismissed earlier in the day.
7. The Debtor would show the failure to file the appropriate documents was the result of then counsel not fully understanding the requirements of the Bankruptcy Code and was not a conscious indifference on behalf of the Debtor.
8. Debtor would show no undo prejudice would result from the reinstatement as not matter were pending before the Court at the time of the dismissal.
9. Debtor request the Court set aside the dismissal and allow the Debtor to complete its Chapter 11 reorganization..

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully pray the Order Dismissing the Case be set aside and the case be reinstated and for such other and further relief in law or in equity to which he may show themselves justly entitled.

Respectfully submitted,

____/S/____ Eric Liepins_____
Eric A. Liepins, SBN 12338110
Eric A. Liepins, P.C.
12770 Coit Road
Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to all creditors of the debtor on this the 29th day of November 2023.

____/S/____ Eric Liepins_____
Eric A. Liepins